

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR  
9004-1(b)**

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In Re:

William J Focazio

Debtor.

Case No.: 19-10880

Chapter: 11

Judge: Vincent F. Papalia, U.S.B.J.

Hearing Date: 2/26/2021 at 10:00 AM

**LIMITED OBJECTION OF ALLSTATE NEW JERSEY PROPERTY AND CASUALTY  
INSURANCE COMPANY TO DEBTOR'S MOTION PURSUANT TO 11 U.S.C. §§105(A),  
349 AND 1112(B), FED. R. BANKR. P. 1017(A) AND 9019, (I) APPROVING  
SETTLEMENT (II) DISMISSING THE DEBTOR'S CHAPTER 11 CASE AND (III)  
GRANTING RELATED RELIEF**

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Allstate New Jersey Property and Casualty Insurance Company ("Allstate") submits this limited objection to Debtor's motion pursuant to 11 U.S.C. §§105(a), 349 and 1112(b), Fed. R. Bankr. P. 1017(a) and 9019, (I) Approving Settlement (II) Dismissing the Debtor's Chapter 11 Case and (III) Granting Related Relief and, through its attorneys Giordano, Halleran & Ciesla, P.C., respectfully represents:

**INTRODUCTION**

1. On January 15, 2019, the Debtor filed a Voluntary Petition under Chapter 11 of the Bankruptcy Code.

2. On February 11, 2021, the Debtor filed, under shortened time, a Motion re: pursuant to 11 U.S.C. §§105(a), 349 and 1112(b), Fed. R. Bankr. P. 1017(a) and 9019, (I) Approving Settlement (II) Dismissing the Debtors Chapter 11 Case and (III) Granting Related (ECF No. 251).

**LIMITED OBJECTION**

3. Allstate objects to the dismissal of debtor's chapter 11 case absent the parties' entry of a settlement agreement and the Court's approval of the settlement agreement between the Debtor and Allstate as well as the confirmation of related entity Chapter 11 Plans of Reorganization.

**CONCLUSION**

Based on the foregoing, Allstate respectfully requests that this Court not permit the Debtor's Chapter 11 Case to be dismissed.

Respectfully submitted,

Giordano, Halleran & Ciesla, P.C.  
Attorneys for Allstate New Jersey Property and  
Casualty Insurance Company

By: /s/ Donald F. Campbell, Jr.  
DONALD F. CAMPBELL, JR.

Dated: February 22, 2021